

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILEDfor the
Southern District of Texas

OCT 17 2014

David J. Bradley, Clerk

United States of America

v.

Victor Manuel Moreno-Ruiz YOB: 1983 Citizenship:MX

Case No. 11-14-2025-MDefendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 04, 2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1324(a)(1)(A)(ii)

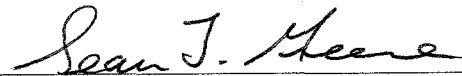
knowing or in reckless disregard of the fact that Bibi Solis-Cruz and three other individuals who were aliens and noncitizens of the United States, have come to, entered, or remains in the United States in violation of law, transports, or moves, or attempts to transport or move such aliens with the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

On August 04, 2014, Border Patrol agents encountered the subject in Hidalgo County, Texas along with two additional smuggled undocumented aliens (UDAs). It was later determined that the subject had served as a guide to the UDAs during the smuggling event.

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.



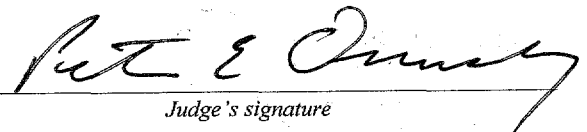
Complainant's signature

Sean T. Greene, HSI Special Agent

Printed name and title

Approved to file Kimberly Ann Leo
AUSA

Sworn to before me and signed in my presence.

Date: 10/17/20142:15 pm

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter E. Ormsby

Printed name and title

ATTACHMENT "A"

On August 4, 2014, Border Patrol Agents (BPAs) conducting line watch duties along the Rio Grande River encountered a group of three (3) undocumented aliens (UDAs) near the Pharr, Texas Port of Entry. The UDAs were identified as Victor Manuel MORENO-Ruiz (hereinafter MORENO), Bibi SOLIS-Cruz (hereinafter SOLIS), and Luis Manuel CASTRO-Esquivel (hereinafter CASTRO). MORENO was subsequently arrested and convicted of violating Title 8, United States Code, Section 1325(a)(1) and sentenced to 75 days in the custody of the Bureau of Prisons, where he currently remains. SOLIS and CASTRO were processed for administrative violations of the Immigration and Nationality Act and returned to Mexico.

On October 16, 2014, Special Agents (SAs) with Homeland Security Investigations encountered SOLIS. SAs interviewed SOLIS regarding the facts surrounding her illegal entry to the United States and the aforementioned apprehension by BPAs. SOLIS identified MORENO from a photo lineup as the individual that served as the guide when she was apprehended on August 4, 2014. SOLIS identified a photograph of CASTRO as a UDA that entered the United States illegally with her and was subsequently apprehended along with her by BPAs.

SOLIS stated that on August 3, 2014, MORENO retrieved her, CASTRO and another two UDAs from an alien stash house in Reynosa, Tamaulipas, Mexico. SOLIS stated that MORENO then guided her and the other UDAs as they entered the United States illegally via a clandestine route in the vicinity of the Pharr International Bridge. SOLIS indicated that MORENO continued to guide them after entering the United States until they were apprehended by BPAs. SOLIS stated when they were taken into custody MORENO instructed her and the other UDAs not to inform the BPAs that he was the guide.